

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

This matter comes before the court upon the *ex parte* motion of the United States for (1) authorization to disclose grand jury matter to the defense team in the above-captioned case, and (2) a protective order to safeguard such grand jury matter from disclosure to persons outside of the defense team. After considering the motion and the file in this case, the court finds good cause for the relief requested, and

IT IS HEREBY ORDERED that the motion is granted. The attorney for the Government is authorized to disclose to the defendant or to her counsel of record grand jury matter which the United States intends to disclose in order to fulfill its statutory and Constitutional discovery obligations in this case. The term "grand jury matter," as used in this order, means (1) transcripts of testimony before the grand jury, and (2) documents or objects marked as grand jury exhibits.

IT IS FURTHER ORDERED that, upon receipt of the grand jury matter described above, the defendant and her counsel of record are prohibited from distributing, disseminating, disclosing or

1 exhibiting such grand jury matter to any person who is not part of the defense team and for any  
2 purpose other than preparing a defense of this case. The term "defense team," as used in this order,  
3 means, for each defendant, the defendant; the defendant's counsel of record, including members,  
4 associates, paralegals and office staff of counsel of record's law firm; and investigators, experts and  
5 consultants hired by counsel of record to assist in the defense of this criminal case.

6 IT IS FURTHER ORDERED that each counsel of record ensure that every member of the  
7 defense team is advised of this protective order and agrees to be bound by its terms.

8 IT IS FURTHER ORDERED that if, in the course of preparing the defense in this case, counsel  
9 of record or any member of the defense team needs to disclose grand jury matter to any person outside  
10 of the defense team (such as to a third-party witness), counsel of record must obtain prior written  
11 authorization from the court, with such authorization to require that any such person to whom grand  
12 jury matter is disclosed agree to be bound by the terms of this protective order, that grand jury matter  
13 be only shown to, and not left with, such person, and that the grand jury matter remain in the custody  
14 and control of the defense team.

15 IT IS FURTHER ORDERED that nothing herein should be construed as enlarging the  
16 Government's discovery obligations or creating any right to material not otherwise discoverable, as  
17 determined by the Government or as directed by the court; and

18 IT IS FURTHER ORDERED that at the conclusion of the proceedings in this case, counsel of  
19 record shall return to the Government, upon request, any grand jury matter disclosed.

20 IT IS SO ORDERED.

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22 DATED: April 22, 2008

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24 M. James Lorenz  
United States District Court Judge

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